

## State of Ohio Environmental Protection Agency

24049

## **Southwest District Office**

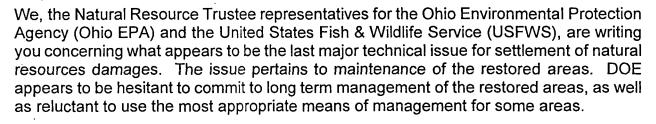
401 East Fifth Street Dayton, Ohio 45402-2911 TELE: (937) 285-6357 FAX: (937) 285-6404

Bob Taft, Governor Maureen O'Connor, Lt. Governor Christopher Jones, Director

December 18, 2001

Mr. Steve McCracken USDOE FEMP P.O. Box 538705 Cincinnati, OH 45253-8705

Dear Mr. McCracken,



We believe that long term maintenance of the restored areas of Fernald is a necessary part of DOE's obligations to restore the site. Maintenance of the restored areas will not be a resource intensive effort, especially when compared to other stewardship activities that will be necessary at Fernald. The needed activities are described in the draft NRRP section on Restored Area Maintenance Requirements. These efforts could readily be completed by contractors or by some future steward of the site on DOE's behalf. Considering the effort, resources and focus being placed upon the restoration at Fernald, we and hopefully DOE, feel it is important to ensure the long term viability of these projects through an appropriate maintenance program.

Certain ecosystems require specific maintenance actions to achieve their appropriate endstate. At Fernald, we have chosen to utilize two fire dependent ecosystems, prairies and savannas. These ecosystems were selected based upon regional appropriateness, postremediation soil conditions and deer management issues for forest restorations. The decision to heavily rely on these two ecosystems results in considerable savings with regard to material, installation and maintenance costs. However, in order for these ecosystems to attain/retain their desired state of diversity and functionality, it is necessary to utilize controlled/prescribed burns as part of their maintenance regime. A number of praire/savanna species rely on fire for reproduction. Fire is important for nutrient cycling and control of woody invasion. Prescribed fire is a necessary tool for management of these ecosystems. If prescribed fire is not an available tool, then the use of these ecosystems at Fernald needs to be reconsidered.

We understand that DOE has imposed a moratorium on prescribed burns as a result of difficulties with the 2000 fires near Los Alamos and Hanford. We also understand that

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> Fernald can request an exemption from this moratorium. Prescribed burns have been utilized at several DOE sites including Rocky Flats, Argonnne and Savanna River. Argonne utilizes prescribed burns for the type of maintenance activities that will be needed at Fernald. Prescribed burns are commonly and safely implemented in the Fernald area by the Hamilton County Parks as part of their prairie maintenance program. We believe that prescribed burns are both necessary and implementable at the Fernald site.

> In order to move forward with settlement and current restoration plans, we request that DOE address these two important issues in the very near future.

If you have any questions concerning this letter, please contact us.

Sincerely

Thomas A. Schneider Fernald Project Manager

Office of Federal Facilities Oversight

Ohio EPA

Acting For Mary Knapp Supervisor

Reynoldsburg Ohio Field Office

William & Kurey

**USF&WS** 

CC:

Mark Navarre, OEPA Legal

Tim Kern, OAG

Daniel Dertke, US DOJ John Ebersole, US DOE Pete Yerace, US DOE

Janet Wong, DOI, Office of the Field Solicitor

TAS/